

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

- - - - - : X
PDV USA, INC., :
Plaintiff, :
v. : Case No. 20-cv-3699
INTERAMERICAN CONSULTING INC., :
Defendant. :
- - - - - : X

NOTICE OF MOTION

PLEASE TAKE NOTICE that, pursuant to Local Civil Rule 7.1, PDV USA, Inc. (“PDV USA”) moves this Court for an order granting PDV USA’s *Renewed Motion for Sanctions* (“Motion”).

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, PDV USA shall rely upon the accompanying Memorandum of Law and Declaration of Brady M. Sullivan.

PLEASE TAKE FURTHER NOTICE that, answering papers, if any, must be served within seven (7) days after service of moving papers.

Dated: June 30, 2025
New York, New York

WILLKIE FARR & GALLAGHER LLP

By: /s/ Jeffrey B. Korn

Jeffrey B. Korn
Brady M. Sullivan
787 Seventh Avenue
New York, New York 10019-6099
(212) 728-8000
JKorn@willkie.com
BSullivan@willkie.com

Michael J. Gottlieb (admitted *pro hac vice*)
1875 K Street, N.W.
Washington, D.C. 20006-1238
(202) 303-1000
MGottlieb@willkie.com

Attorneys for Plaintiff PDV USA, Inc.